Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To:	Luda Voskov, Project Manager; SSDAP/Superfund Section, Remediation Division	**Date:**	May 10, 2010
From:	Larry Champagne; Technical Support Section, Remediation Division		
Subject:	Gulfco Marine Maintenance NPL Superfund Site Draft Wetland Sediment Hot Spot Remediation Work Plan April 29, 2010		

I have completed my review of this work plan. For the most part, this work plan does a good job of identifying those wetland sediment sample locations that are in the most need of remediation. However, I do have a few concerns and these are outlined in the comments below.

Sample location NF4SE13 with a zinc concentration of 903 mg/kg is not proposed for remediation, but should be. This concentration is more than double the Effects Range Median (ERM) for benthics and could thus serve as a source for further contamination. The rationale used to exclude this location is insufficient. NOAA (1999) identifies a 70% incidence of effects when zinc sediment concentrations exceed their ERM of 410 mg/kg.

Some confirmation sampling in and adjacent to the excavation areas to verify that COPEC concentrations above their respective Effects Range Low/ERM midpoints are not left behind should be included in this work plan.

As this work plan includes restoration of the wetlands to pre-remediation conditions, it is important that communication of the proposed restoration be made with both state and federal Natural Resource Trustee agencies. The Trustees may have some recommendations on how best to minimize impacts to wetland areas from construction equipment and may have a preference for the plant species used for restoration.

Effects Range "Medium" should be Effects Range "Median".

References:

NOAA. 1999. Sediment Quality Guidelines Developed for the National Status and Trends Program.
http://response.restoration.noaa.gov/book_shelf/121_sedi_qual_guide.pdf

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